## CITY OF SAN DIEGO STORM WATER DEPARTMENT

## MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM

## **Project Description**

The City of San Diego is proposing to implement a Master Storm Water System Maintenance Program (MSWSMP) that will govern long-term maintenance activities required to adequately protect life and property from flooding events.

The City's Storm Water Department manages a system comprised of approximately 50 miles of natural and man-made (concrete/earthen) channels, detention basins, and storm drain outfalls that cover approximately 342.4 square-miles of metropolitan area. These facilities are distributed among seven watersheds that ultimately drain westward to the Pacific Ocean.

The City's major drainage facilities include Alvarado Creek, Chollas Creek, Rose Creek, Nestor Creek, San Diego River, Penasquitos Creek, Otay River, and Tijuana River. The Storm Water Department's Operations and Maintenance Division is responsible for maintaining these channels, along with their associated drainage control structures (e.g. outfalls and detentions basins).

The main function of these channels is to convey water runoff from storm events and urban development helping the City to protect life and property from flooding. The MSWSMP balances and integrates conventional flood control strategies for large, infrequent storms with storm water quality control strategies and natural resource protection by conducting hydrology studies prior to developing a maintenance strategy to assure that excessive maintenance does not occur and that vegetation can be left in place whenever possible. In addition, the MSWMSP establishes a series of operational protocols which will be carried out during the Department's annual maintenance activities and are intended to minimize impacts related to soil and erosion, water quality, and wildlife disruptions.

Strict local, state, and federal regulations apply to the Master Program maintenance activities and will require the City of San Diego to obtain a broad range of permits, formal opinions and agreements to perform the intended work. These include a Master Site Development Permit (SDP), a Coastal Development Permit; an Army Corps of Engineers Section 404 Permit; a US Fish and Wildlife Service Section 7 Biological Opinion; a California Fish and Game Streambed Alteration Agreement; and a California Regional Water Quality Control Board 401 Certification.

The Department has actively engaged each of these agencies as part of the preliminary review process and has incorporated their recommendations into the Master Program planning process. Through a Consistency Determination (CD) review process; local, state, and federal agencies with regulatory authority over aquatic resources will have the opportunity to review the maintenance activities authorized under the MSWSMP.

## Program Environmental Impact Report (PEIR)

The City, as the Lead Agency, has prepared a Program Environmental Impact Report (PEIR) for the Master Storm Water System Maintenance Program. This PEIR concluded that significant environmental impacts could occur with respect to the following issues: land use, biological resources, cultural and paleontological resources, solid waste, and water quality. Land use impacts would occur when local community plans contains goals and objectives to retain naturally vegetated drainages as a visual amenity. The PEIR concluded that there was no feasible means of mitigating the aesthetic impacts of maintenance due to the inability to retain major stands of vegetation while still protecting adjacent property from flooding.

With respect to biological resources, the PEIR concluded that maintenance would have significant impact on wetlands and the associated wildlife. To a lesser degree, upland habitat would also be impacted by the construction of access paths to the storm water facilities. Biological resource impacts would be mitigated through wetland restoration and enhancement as well as acquisition of comparable upland habitat.

Cultural and paleontological resource impacts could occur if maintenance disturbs cultural and/or paleontological resources which may be associated with storm water conveyance facilities. Mitigation measures to reduce the potential impact include monitoring maintenance activities and salvaging significant resources which cannot be avoided.

Impacts to solid waste would occur from disposal of vegetation and sediment removed from storm water facilities during maintenance. Because of the limitations associated with landfill capacity, the additional burden from maintenance disposal was considered significant. Wherever possible, the City intends to recycle vegetation but the overall impact is considered unmitigated.

Impacts to water quality would result from the removal of vegetation which, in and of itself, serves to reduce erosion and extract water-borne pollutants. Impacts related to the loss of these functions would be reduced by following the protocols contained in the Master Program which include downstream devices to slow storm water runoff to non-erosive rates and allow sediment to be deposited in a confined area.

The City has received a variety of comments on the EIR and is currently in the process of preparing detailed responses to the comments. These responses are expected to be available to the public prior to the Planning Commission hearing on the Master Program which is anticipated to occur on April 1<sup>st</sup>.